

The Honorable John H. Chun

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JOAN LOUW-DEFAZIO and DANIEL  
CONCANNON; individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

AVVO, INC.,

Defendant.

No. 2:25-cv-00868-JHC

STIPULATED MOTION AND  
[PROPOSED] ORDER EXTENDING  
TIME FOR DEFENDANT AVVO,  
INC. TO RESPOND TO  
PLAINTIFFS' COMPLAINT

NOTE ON MOTION CALENDAR:  
July 2, 2025

**STIPULATION**

Plaintiffs Joan Louw-DeFazio and Daniel Concannon and Defendant Avvo, Inc. stipulate to the Court's entry of the proposed order set forth below.

In support of this request, the parties represent the following:

1. The deadline for Avvo to answer or otherwise respond to Plaintiffs' Complaint is July 7, 2025.

2. Avvo intends to file an expedited notice to dismiss under Washington's Uniform Public Expression Protection Act ("UPEPA"), RCW 4.105 et seq. Avvo provided Plaintiffs notice of this intent on June 30, 2025, triggering a 14-day period after which Avvo will file its UPEPA motion. Avvo also intends to seek dismissal under Rule 12(b)(6).

3. The parties agree that it would be more efficient for Avvo to file a single brief

combining its UPEPA and Rule 12(b)(6) arguments on July 14, 2025, rather than a motion to dismiss under Rule 12(b)(6) on July 7 and a UPEPA motion on July 14. They thus agree Avvo's response deadline should be moved to July 14, 2025.

4. The requested extension will not affect any other dates in this case.

5. The parties respectfully request that the Court enter the order set forth below, approving the requested extension.

DATED this 2nd day of July, 2025.

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**ORDER**

Based on the above stipulation, it is ORDERED that the time for Defendant Avvo, Inc. to answer or otherwise respond to Plaintiffs' Complaint in this action is extended to and including July 14, 2025.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

Presented by:

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